

IN THE U.S. DISTRICT COURT OF MARYLAND
FOR DISTRICT OF MARYLAND

Todd Feehley, et al.
*on behalf of themselves and
others similarly situated*

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Plaintiffs

*

v.

*

Case No. TJS-17-02591

Sabatino's, Inc.
(t/a "Sabatino's Italian Restaurant), et al.

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Defendants

/

JOINT MOTION TO APPROVE SETTLEMENT AGREEMENT

The parties jointly move that the Court approve the attached settlement agreement (Ex. 1). In support of this Motion, the parties state as follows:

1. The parties conducted a full exchange of information, including payroll records, prior to engaging in settlement discussions.

2. The settlement agreement was reached in mediation before Magistrate Judge Timothy J. Sullivan on February 19, 2019. Each side was capably represented by experienced counsel.

3. The settlement agreement provides for a total payment of \$97,285.90 to the eleven (11) Plaintiffs, which represents 100% of their disputed wages, and an additional payment \$48,641.13 for the Plaintiffs' attorneys' fees and costs, which represents less than 100% of the accrued attorneys' fees plus their actual costs. The Plaintiffs have not been (and will not be) required to pay any of the attorneys' fees and costs in this case.

4. The settlement agreement reached is reasonable and fair, considering the facts and issues in controversy. The Court is fully aware of the fact and legal issues, having presided over the settlement negotiations.

March 11, 2019

Respectfully submitted,

/s/ (with permission)

/s/ (with permission)

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Attorneys for Plaintiffs

APPROVED:



Hon. Timothy J. Sullivan
U.S. Magistrate Judge

March 13, 2019

Date